

ORIGINAL

SAMUEL .T.POOLE

CIVIL ACTION 99-635 SLR

H V.

STAN TAYLOR
RAPHAEL WILLIM
JANE BRADY

JUDGE SUE L. ROBINSON

MOTION TO ORDER

IN RE,RULE12(F) TOWhere the defendants is now under estoppel andnow trying to get a ruleing in there favor from fraud and from failure to comply with the discovery.

IN RE,F,R,CIV,P, rule 56 (C)see 3 BORROW AND HOLTCOFF, FEDERAL PRACTICE AND PROCEDURE,159-60 (Wright ed,1958).see annot.,74 A.L.R.2d 984 (1960)F.R.Civ.P.56(G)as amended Dec.27,1946.,eff. Mar.19,1948 Jan.21,1963 eff. Jule 1,1963;Mar.2,1987,eff. Aug.1,1987., to where judgement can not be issued unless the defendants respond Anderson V. Liberty lobby inc.477 U.S.242,247 (1986) F.R.Civ.P.56(C) Anderson, 477 U.S.at 256

RELIEF-to be order-pending civil investagation from the fraud and the damages under EQUITABLE ESTOPPEL.,failure of defendants to particpate in good faith in discovery(U.S.C.-2412,(C)(2) and then see title (28 U.S.C. 28-2414 and see 2515 and see also (TITLE U.S.C.28- 2412 (D)(d)to be order to the defendants under ESTOPPEL., FOR THE FRAUD AND DAMAGES UNDER EQUITABLE ESTOPPEL., AND FOR A CIVIL INVESTAGATION CONTAINING TO F.R.CRIM.P.TITLE 18 1968 IN RE;Harrison,D.C.App. 46 A2d.,1034,1036.

NOW COMES, SAMUEL T. POOLE AND AFIRMS THAT HE IS THE AFORE CAPTIONED AND ATTACHED MATTER,THAT THE WITHIN AVERMENTS AND FACTS IN SUPPORT THEREFORE ARE TRUE AND CORRECT TO THE BEST OF HIS PERSONAL EXPERIENCE, RECALL, KNOWLEDGE AND BELIEF, UNDER PENALTY FOR PERJURY. HE FURTHER AFFIRMS AND AVERS THAT HE HAS SERVED COPIES OF THE FOREGOING AND ATTACHED DOCUMENTS BY FIRST CLASS MAIL TO THE PARTIES LISTED BELOW,BY HAVING PLACED IN THE HANDS OF PRISON AUTHORITIES FOR MAILING,AS RULED PROPER AND TIMELY "FILED" BY AND IN HOUSTON V. LACK,108.S. CT.2379,at2383,(1988).

I CERTIFY THAT THIS DOCUMENT WAS GIVEN TO PRISON OFFICIALS,FOR THE FORWARDING TO THE SAID COURT.
I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.* U.S.C. SEC.1746.

by affiant;

SAMUEL T. POOLE

C.C.:CERTIFIED TO (HUBBARD RICHARD 820 N.FRENCH ST. 7th FLOOR
WILM,DE.19801
2 copies

thank you
RESPECFULLY SUBMITTED

